



# **CORRECTIVE ACTION PLAN**

**FORMER WESTPARK PLAZA  
WHITLOCK AVENUE  
MARIETTA, COBB COUNTY, GEORGIA**

**Submitted to:**

**Georgia Department of Natural Resources  
Hazardous Waste Management Branch  
Suite 1154, East Tower  
2 Martin Luther King Jr. Drive SE  
Atlanta, Georgia 30334**

**Prepared for:**

**Cobb County**

**Prepared by:**

**MACTEC Engineering and Consulting, Inc.  
396 Plasters Avenue  
Atlanta, Georgia**

**October 2004**

**Project No. 6305-04-0206.02**

 **MACTEC**



October 25, 2004

Ms. Madeleine Kellam  
Georgia Department of Natural Resources  
Hazardous Waste Management Branch  
Suite 1154, East Tower  
2 Martin Luther King Jr. Drive SE  
Atlanta, Georgia 30334

**Subject:**      **Corrective Action Plan**  
                 **Former Westpark Plaza**  
                 **Marietta, Cobb County, Georgia**  
                 **MACTEC Project No. 6305-04-0206**

Dear Ms. Kellam:

MACTEC Engineering and Consulting, Inc. (MACTEC) respectfully submits this Corrective Action Plan pursuant to Section 12-8-200 of the Hazardous Site Reuse and Redevelopment Act on behalf of our client, Cobb County.

We appreciate your assistance with this matter. Please contact Steve Foley or Chuck Ferry at 404-873-4761 with any questions you may have regarding this submittal.

Sincerely,

MACTEC Engineering and Consulting, Inc.

*Stephen R. Foley*  
Stephen R. Foley, P.G.  
Senior Geologist

*Charles T. Ferry*  
Charles T. Ferry, P.E.  
Senior Principal

cc:    Mr. Samuel Olens, Cobb County  
      Mr. Gerald Pouncey, Morris, Manning & Martin



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## 1.0 BACKGROUND

The subject property is located at 750 Whitlock Avenue in Marietta, Georgia and encompasses approximately 8.276 acres. The site is bounded to the west by Mountain View Road, to the south by Whitlock Avenue, to the east by commercial properties and to the north by residential properties. A legal description of the property and a site plan has been included in Appendix 1. The site is developed with the former Westpark Plaza Shopping Center, which is currently vacant as shown on Figure 1 in Appendix 2.

Cobb County is planning to purchase the subject site for redevelopment purposes. The property is planned to be redeveloped for use by Cobb County as administrative offices.

A number of previous environmental assessments have been conducted at the subject site by Law Engineering and Environmental Services, Inc. (predecessor by merger to MACTEC) and by others between 1988 and 2004. In addition, a release notification was submitted to the Hazardous Site Response Program in May 2000 documenting soil and groundwater contamination identified in the vicinity of an on-site drycleaner. The following lists the previous reports and correspondences on which MACTEC is partly basing this corrective action plan.

- Environmental Inspection Report, prepared by MDN&T, Inc. for Home Life Insurance Company, dated September 23, 1988;
- Environmental Inspection Report – Update, prepared by PCI, Inc. for Home Life Insurance Company, dated September 16, 1991;
- Phase I Environmental Assessment for the Westpark Plaza Shopping Center prepared by ATC Associates (ATC) for Chemical Bank/Chase and Phoenix Home Life Mutual Insurance Company, dated March 12, 1997;
- Phase II Site Investigation, prepared by Levine-Fricke-Recon, Inc. (LFR) for Lennar Partners, Inc., dated April 14, 1997;
- Report for Limited Phase II Environmental Site Assessment, prepared by ATC for Lennar Partners, Inc., dated April 24, 1997;
- Water Usage Survey, prepared by Law Engineering and Environmental Services, Inc. (LAW) for Morris, Manning & Martin, dated July 9, 1997;
- Report of Environmental Site Assessment, prepared by LAW for Phoenix Home Life Mutual Life Insurance Company, dated May 12, 1999;
- No Listing Determination Letter and backup memoranda, prepared by GA-EPD Hazardous Site Response Program, dated January 8, 2001.
- Report of Supplemental Soil Sampling and Testing, prepared by LAW for Phoenix Home Life Mutual Life Insurance Company; dated January 12, 2001;

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- Report of Removal of Solvent Contaminated Soil, prepared by LAW for United Retail Development Company, LLC, dated August 31, 2001;

Based on MACTEC's review of the aforementioned documents, we offer the following comments:

- Previous historical research indicates the site consisted of residential or agricultural property until 1980 when the Westpark Plaza Shopping Center was constructed. The tenant space in the westernmost portion of the building was occupied by a dry cleaner from 1980 until approximately 2000. The cleaner operated dry cleaning equipment, except for a short time prior to closure in 2001 when it was a pick-up/drop-off facility.
- Initial subsurface testing conducted in 1997 identified chlorinated solvents in the soil and groundwater in the immediate vicinity of the on-site dry cleaner. Maximum concentrations detected in soil were 51,800 ug/kg of tetrachloroethene (PCE) and 846 ug/kg of trichloroethene (TCE). One groundwater sample was collected from the area immediately southeast of the dry cleaner. PCE and TCE were detected in groundwater at concentrations of 320 ug/l and 90 ug/l, respectively.
- Subsequent testing conducted by LAW in May 1999 identified elevated concentrations of a number of chlorinated compounds in soil beneath the dry cleaner tenant space. Maximum concentrations detected in soil were 8,900 ug/kg of PCE, 670 ug/kg of TCE and 840 ug/kg of dichloroethene (DCE). Lower concentrations of other chlorinated compounds, including dichloroethane, chlorobenzene and chloroform were also detected. Only PCE, TCE and DCE were detected in soil in excess of their respective HSRA notification concentrations. Groundwater testing identified PCE, TCE and DCE in one well located immediately south of the dry cleaner at concentrations higher than those previously detected on site (10,000 ug/l of PCE, 1,600 ug/l of TCE and 430 ug/l of DCE). Chlorinated compounds were not detected in two other wells located near Whitlock Avenue in the southern, downgradient portion of the site.
- In May 2000, a HSRA notification package was submitted to the GA-EPD by Mr. David Stewart of S&S Dry Cleaning. The site was determined by GA-EPD to have a RQSM groundwater pathway score of 0.81. Because the reported soil contamination was located beneath the former building, the site was deemed to be of limited accessibility. As a result, the on-site pathway score calculated for the site by GA-EPD was 18.52.
- The Georgia EPD Hazardous Site Response Program issued a letter dated January 8, 2001 in which they stated, "EPD has no reason to believe that a release exceeding a reportable quantity has occurred at this site. Therefore, this site will not be listed in the Hazardous Site Inventory."
- The property was under consideration for purchase by United Retail Development Company (United) in late 2000. Prior to its acquisition, supplemental soil testing was conducted by LAW in December 2000 and January 2001 to delineate the extent of contamination above HSRA

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notification concentrations. The testing results indicated that the bulk of the soil contamination was located underneath the western portion of the building, in the area beneath the dry cleaner and the adjacent tenant space to the east.

- In July 2001, immediately following the acquisition of the property by United, a portion of the building, including the dry cleaner space and four tenant spaces to the east, was demolished. MACTEC then monitored the excavation and removal of solvent-contaminated soils down to the water table/capillary fringe. The soils were transported off-site and properly disposed. Confirmation sampling conducted following the excavation indicated that remaining soils along the sidewalls of the excavation were below HSRA notification concentrations.
- There are no active drinking water wells within three miles of the site.
- The site is currently under consideration for acquisition by Cobb County. In September/October 2004, as part of pre-purchase due diligence, additional soil testing was conducted on site, in the area immediately surrounding the former excavation, as well as in the area north of (behind) the former dry cleaner. Soil testing identified some areas near the edge of the former excavation where chlorinated solvents exceeded HSRA risk reduction standards. These areas are to be addressed by additional corrective action, as described below in Section 3.0. Significant concentrations of chlorinated compounds were not detected in soils in the area generally north of the former building. The recent soil testing data is summarized on the attached Figure 2.
- In October 2004, supplemental groundwater testing was also conducted on site which identified chlorinated compounds in the area of and immediately southwest of the former dry cleaner. Chlorinated compounds were not detected in monitoring wells installed within the parking lot approximately 200 feet south of the former dry cleaner tenant space. Groundwater impact was detected in a deep well located immediately southwest of the source area. The recent groundwater testing data is summarized on the attached Figure 3.
- Based on recent measurements taken from on-site wells, the groundwater flow direction across the site is interpreted to be generally in the southerly direction. In the area of the former dry cleaner, there is a southwestern component to the flow; however, the gradient shifts more to the southeast nearer Whitlock Avenue as illustrated on Figure 4.

The site has received a no listing letter. Because soil contamination above HSRA residential soil risk reduction standards (SRRS) has been identified in recent testing, additional assessment is planned to delineate soil contamination in the vicinity of the former excavation so that remediation of all soil to below HSRA SRRS can be accomplished during site development by Cobb County. See Section 3.0 Additional Assessment for a summary of anticipated additional assessment activities.

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Photoionization Detector (PID) readings were taken at intervals of six inches in the soil borings and are recorded on the table in Appendix 3. Monitoring well logs are also attached in Appendix 3. The complete laboratory reports reflecting existing conditions are included as Appendix 4.

## **2.0 QUALIFICATION OF SITE AND PROSPECTIVE PURCHASER**

We understand that the Hazardous Site Reuse and Redevelopment Act has set forth certain criteria in order for a property and a prospective purchaser to qualify for the Brownfield limitation of liability. Based on our understanding of the site and prospective purchaser, we conclude that both the property and the purchaser meet the Act's requirements as summarized below.

### **2.1 The subject property:**

- 1) has had a pre-existing release;
- 2) does not have liens filed under subsection (e) of Code Section 12-8-96 against it;
- 3) a) is not listed on the federal National Priority List;  
b) is not undergoing response activities by an order of the Environmental Protection Agency;  
c) is not a hazardous waste facility as defined in Code Section 12-8-62.

### **2.2 The prospective purchaser (Cobb County):**

- 1) is not a person who has contributed or who is contributing to a release at the property;
- 2) is not related, does not have business relations or is not otherwise affiliated with the current owner of the subject property (United Retail Development Company, LLC) or any person who has contributed or is contributing to a release at the site;
- 3) has not found evidence of liens filed under subsection (e) of Code Section 12-8-96 against the property;
- 4) is not in violation of any order, judgment, statute, rule, or regulation subject to the enforcement authority of the director.



### 3.0 ADDITIONAL ASSESSMENT

Although extensive assessment and soil remediation has been performed at the subject site, recent sampling data indicates that some additional remediation is required to address soils which remain on site above HSRA risk reduction standards (RRS). Prior to initiating such remediation, additional sampling has been proposed to complete the delineation of the affected soils.

We anticipate the installation of up to 12 Geoprobe borings to further evaluate the extent of soil contamination in the vicinity of the previous soil excavation. Soil samples will be analyzed by a qualified laboratory, for Volatile Organic Compounds (VOCs) by EPA test method 8260B.

#### 4.0 CORRECTIVE ACTION PLAN

Contaminated soils at the site which contain constituents that exceed the Hazardous Site Response Act (HSRA) residential Soil Risk Reduction Standards (SRRS) will be excavated and removed from the site. At this time, we anticipate that the cleanup criteria to be employed will be the HSRA residential SRRS for the various compounds which have been detected on site. These concentrations are proposed as a conservative measure since the end use of the site is planned to be non-residential. Based on the data obtained to date, three compounds PCE, TCE and cis-DCE currently exceed their respective SRRS concentrations of 500 ug/kg, 500 ug/kg and 530 ug/kg.

Pre-excavation delineation soil sampling will be performed as described above in Section 3.0 to more closely define/delineate the limits of impacted soil that exceed the residential SRRS. The on-site horizontal extent of the impacted soil will be delineated at lateral distances from any sample where the residential SRRS concentrations are exceeded. Previous sampling has determined that the vertical extent of the soil contamination is limited by the groundwater table which occurs at a depth of approximately nine to ten feet in the affected area.

Identified impacted soil areas will be excavated to the limits determined by the pre-excavation delineation sampling by the Applicant's consultant. Excavated material that requires off-site disposal will be placed directly into roll-off boxes or onto covered asphalt pavement with appropriate cover and erosion control. The extent of excavation of impacted soil areas will be confirmed through verification sampling. Verification soil samples will be collected along the sidewalls at an approximate rate of one sample for every 25 linear feet of sidewall. The excavation will be terminated at the depth at which groundwater is encountered. Soil verification samples will be analyzed by a qualified laboratory for VOCs by EPA test method 8260B.

The excavation, handling, transport, and disposal of the source material will be performed by methods that: (i) prevent contamination of the surrounding environment (soil, water, air), (ii) are in accordance with federal, state, and local laws, and (iii) protect personnel in the excavation area and adjacent areas.

Disposal characterization samples of the excavated material will be collected and analyzed by a qualified laboratory in accordance with the selected permitted disposal facility's requirements. The excavated impacted soil will be transported in compliance with all applicable regulations for transporting such waste and disposed at a pre-approved disposal facility permitted to accept the designated waste.

The work will be performed in compliance with applicable OSHA regulations, and in accordance with a project specific Health, Safety and Emergency Response Plan.

## **5.0 SCHEDULE**

We anticipate that the corrective action will be completed within 180 days of approval of the corrective action plan.

## 6.0 PREPARATION OF CSR

MACTEC will prepare a Compliance Status Report (CSR) on behalf of Cobb County upon completion of the additional assessment and corrective action as outlined in Sections 3.0 and 4.0. The written report will consist of information in the format required for submission to the GA-EPD. The CSR will include the following:

- A description of each known source of release,
- A legal description of the property which comprises the brownfield site,
- A summary of all pertinent field and laboratory data,
- Definition of the horizontal and vertical extent of on-site soil and groundwater contamination,
- A description of geologic and hydrogeologic conditions at the site,
- A description of existing or potential human or environmental receptors,
- A summary of previous actions taken to eliminate, control, or minimize the potential risk at the site,
- Documentation of the proper characterization, transportation, and disposal of contaminated soils and/or hazardous wastes, if any, and
- A concise statement of the findings of the report including Cobb County's certification of compliance with the appropriate soil risk reduction standards.

## 7.0 CERTIFICATION STATEMENT

I certify that this report and all attachments were prepared under my direction in accordance with a system designed to assure that qualified personnel properly evaluated the information submitted. Based on my inquiry of the person or persons who prepared the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete.



Samuel S. Olens, Chairman  
Chairman, Cobb County Board of Commissioners  
On behalf of Cobb County, Prospective Purchaser

10/26/04  
Date

**APPROVED**  
PER MINUTES OF  
COBB COUNTY  
BOARD OF COMMISSIONERS

7/13/04